

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

HANGZHOU KILAI NECKWEAR  
APPAREL CO. LTD.,

Plaintiff,

-against-

NCP DIRECT SOURCING, INC., NCP DIRECT  
SOURCING, INC., THOMAS PAGLIA, AND  
JOHN DOE 1-10, AND XYZ COMPANY 1-10,

Defendants

X

: Case No. 15-CV-1441 (AN)

**NOTICE OF MOTION**

X

**NOTICE OF MOTION OF TEITELBAUM & BASKIN, LLC TO WITHDRAW AS  
COUNSEL FOR DEFENDANTS NCP DIRECT SOURCING, INC., NCP DIRECT  
SOURCING INC. AND THOMAS PAGLIA**

PLEASE TAKE NOTICE, that upon the accompanying affidavit of Jay Teitelbaum, Esq, sworn to January 8, 2016, and the motion of Teitelbaum & Baskin, LLC, dated January 8, 2016, Teitelbaum & Baskin will move this Court before the Honorable Allison J. Nathan, U.S.D.J. at the United States Courthouse for the Southern District of New York, 40 Foley Square, New York, New York, Courtroom 906 on February 1, 2016, at 9:30 a. m. or as soon thereafter as counsel may be heard, why an order should not be entered pursuant to Southern District Local Civil Rule 1.4, granting Teitelbaum & Baskin's Motion to withdraw as counsel for defendants; and for such other and further relief as the Court may deem just and proper.

The basis for the motion is the failure of Defendants to pay actual and necessary legal fees and expenses incurred and to be incurred on behalf of Defendants.

Dated: White Plains, New York  
January 8, 2016

/s/ Jay Teitelbaum

TEITELBAUM & BASKIN, LLC

*Attorneys for NCP Direct Sourcing, Inc. and  
Thomas Paglia*

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